



Appalachian Mountain Club

July 31, 2000

George Price, Project Manager  
Boston Harbor Islands National Park Area  
408 Atlantic Avenue, Suite 228  
Boston, Massachusetts 02110

Dear Mr. Price:

We wish to offer the following comments on the "Draft General Management Plan and the Draft Environmental Impact Statement" for the Boston Harbor Islands National Park Area. The Appalachian Mountain Club, with 85,000 members of which more than 22,000 are within the Boston Chapter region, has a long-standing interest in the Harbor and its Islands. William D. Glezentanner, the chief planner for the Boston Harbor Islands State Park, is the volunteer AMC representative on the Boston Harbor Island National Park Area Advisory Council.

First, let us commend the National Park Service and the multi-agency Boston Harbor Islands Partnership for recognizing the importance of Boston Harbor and its Islands to the nation and the region. The plan, while being very general, conveys the natural beauty and dramatic potential of this important resource. Once our front yard, Boston Harbor and its Islands became, through decades of neglect, our backyard and a depository for our wastes. Now, Boston Harbor once again, with the aid of billions of public dollars, is returning to its natural health and beauty.

**Scope of the Park – Scope of the Plan**

An important question and concern about the NPA is that of boundaries and scope. The congressional determination of the boundaries of the NPA is an important reference point, as is the State legislation that explicitly includes the watershed, the water area within the NPA boundaries. The National Park Service (NPS), the Massachusetts parks agencies and the other Partners in the Park need to take full advantage of their many and varied statutory and administrative powers to ensure that management of the watershed is fully integrated into the management of the NPA. Management decisions within these agencies will determine the future of shellfishing, aquaculture, pier construction, natural resource protection and expanded human use in the NPA and the waters surrounding the Harbor Islands.

In particular, the management of the watershed needs to emphasize high quality ferry access to the islands, ensuring that hub islands have the infrastructure to accommodate high volume service and that the other islands designated as appropriate for public visitation should be truly accessible to the public through proper management. Decisions about moorings and other facilities for private boaters also need to be integrated into the larger framework of access and land use planning for the Islands.

On the "land side" open and public decisions need to be made about what historic resources on the Harbor Islands should be preserved. Decisions about the importance of historic structures should be made explicit as part of a dynamic and truly public decision-making process.

The Draft General Management Plan and Draft Environmental Impact Statement (mandated by the laws and regulations governing the National Park Service) are so general that it is difficult for the public to provide specific comments on the value and accuracy of data and information. For example, the presence of specific plants and animals is listed for each island without an up-to-date inventory. On page 82 the barn owl is mentioned as a resident on Deer Island and may no longer be accurate given

Main Office • Five Joy Street, Boston, MA 02108-1490 617-523-0636 / FAX 617-523-0722  
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## Appalachian Mountain Club

- It is recognized that park activities and management are dependent on use of these waters. The plan emphasizes cooperation among agencies and organizations, and a new section and a new appendix have been added to the final plan to emphasize the multiplicity of entities and the sometimes overlapping responsibilities of various nonpark agencies. See harbor management policy under external cooperation goal (GMP p. 96), and Appendix 17, Agencies Roles in Resource Protection and Public Safety (GMP p. 156).

the construction of the MWRA sewage treatment plant. It is doubtful they reside there now because their prime nesting areas were within the old buildings that no longer exist. Barn owls were once found on Peddocks Island, in some of the old military buildings but not listed within the documents. The Draft EIS Natural Resource Inventory should be updated and made public for review and comment prior to any further assessment of the relative impacts of the three alternatives. Future conclusions should be developed based on the revised inventory.

#### **The Harbor as an Estuary**

Nowhere in the Draft General Management Plan is the word "estuary" used as a major theme. The islands are within a larger ecosystem, known as an estuary, and as such are part of an extremely important and productive New England marine ecosystem. To neglect the fact that the islands are component of the Boston Harbor estuary is a serious omission that should be corrected. There is no mention of the connection between near-shore waters of Boston Harbor, and their link to the overall health of Boston Harbor estuary, Massachusetts Bay, Stellwagen Bank, the Gulf of Maine and the Atlantic Ocean. These important ecological links should be a central component to the interpretive theme and stewardship of the NPA.

New England salt marshes are the most productive ecosystems on earth. Since colonial times over 50% of Massachusetts' salt marshes have been filled in and destroyed. The Boston Harbor estuary and associated salt marsh ecosystem serves as a nursery area for many marine species, especially commercially important fisheries found offshore. Vital to the success of the new NPA is the continued stewardship of the surrounding waters and wetlands. Ideally the NPA should serve as a leader promoting awareness and understanding of the marine resources surrounding the park. Future development should be carefully evaluated to protect and restore all habitat (including salt marsh, mud flats, rocky intertidal, coastal bluffs, uplands, etc) within the NPA boundary.

#### **The Planning Process**

A draft management plan can quickly become outdated. It is a long held position of the planning profession that comprehensive plans should be "living" documents that are updated periodically, and indeed, the 1972 Comprehensive Plan for the Boston Harbor Islands State Park was successfully updated several times since its inception. The Draft General Management Plan provides a confusing mixture of broad generalities about the future vision of the park. A lack of specific management goals and objectives for the NPA creates a risky situation especially for the viability of certain uses (current and future) on the islands.

In several places the plan seems to state that visitor demand, rather than environmental considerations, will govern future use (page 60), while in other areas it is clear that carrying capacity will govern future use. While we anticipate that the park will generate increasing demand there will always be the need to manage visitor, as well as personnel, uses and behavior. Given that much of the visitation will come via a ferry service (as opposed to private boat), it would seem that management of carrying capacity could be easier to control than in some other parks. Therefore there is less of a need for the NPS to govern future use by demand solely.

#### **Management Plan Implementation:**

Implementation of Draft Management Plan should be carefully coordinated and organized in a comprehensive and coherent manner. Appendix 5 lists more than thirty implementation plans and studies that will be undertaken in order to proceed with the preferred alternative outlined in the DGMP. Noted above we recommend that the Natural Resource Inventory be updated and verified prior to the plan completion and acceptance.

Establish a process to clearly and openly decide if existing uses should continue. Special Uses areas are defined on page 51. They include a mixture of both new facilities (the MWRA Deer Island sewage treatment plant), and historic uses that date back to an earlier era of placing unwanted facilities and uses on islands. The draft plan assumes that all of prior and current uses will be continued. The draft

- The plan now contains several references to the estuary: in the park setting (GMP p. 2) and in the themes (GMP p.46-47).. In addition, the themes have been elaborated in Appendix 18 (p.161). Two of the four themes include emphasis on estuaries. Likewise the EIS now includes reference to the estuary and shore communities (EIS p. 78).
- The purpose of general management plans is to provide guidance for managers in decision making. The lack of specificity is intentional in a general management plan. However, the draft plan has been reworked to make the language more clear and direct in this final plan. In addition, a new section has been added clarifying the way general management plans are to be amended if conditions change substantially.
- The plan did not have the benefit of a current resource inventory, however an extensive natural resource inventory was undertaken and is nearly complete when this plan is being published.

plan should outline a process to re-examine existing uses (e.g. police firing range on Moon Island) on a regular basis and determine their impact and appropriateness to the goals and objectives of the NPA. The process should include the examination of more passive uses that may be more compatible with the future of the NPA.

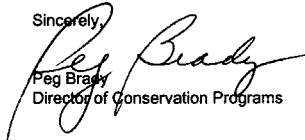
An open forum is needed to allow all interested members of the public to share and explore new and innovative ideas for the future NPA. A wide variety of forums exist that provide for open discussion as well as closed. There is a need for an airing of all relevant ideas especially in the context of the general principles that will guide future uses. A primary area of consideration will be access to particular islands versus possible access limitations (i.e. ferry service only for special events, etc...).

**Other Items**

There is little mention of access to the islands by kayakers. Kayaking is a growing segment of recreational activities in the Boston area. This activity appears to be consistent with the NPA goals and special consideration should be given to encourage kayaking safely to the islands. Private and commercial boating access to the islands needs to be evaluated more comprehensively in context to limiting the potential for user-conflicts and to launching access for other small boats which is not covered in the plan. A major dividend of the Boston Harbor cleanup is the increase in fishing opportunities with the return of striped bass, etc. With the popularity of fishing increasing, there is no discussion of providing additional facilities for fishing within the NPA plan.

Thank you for your consideration of our comments. We appreciate the opportunity to comment on this important public document.

Sincerely,



Peg Brady  
Director of Conservation Programs

Cc: Boston AMC Chapter  
William Giezantanner

- Kayaking is expected to be an important activity among the Boston Harbor Islands. A new section on water-based recreation has been added in a new harbor management policy (GMP p. 97) which supports kayak access to the islands.

Boston Sea Kayak Club  
47 Nancy Rd.  
Newton, Ma 02467

July 28, 2000

George Price, Project Manager  
Boston Harbor Islands  
408 Atlantic Ave, Suite 228  
Boston, Ma 02110-3349

Mr. Price:

I'm writing as an active member of the Boston Sea Kayak Club, a group who are now frequent users of the Boston Harbor Islands both for our day trips and also for camping. I would like to add my comments at this time to the Draft Management Plan.

Generally, we are concerned about access to launch sites from the mainland, auto parking, access to the islands, and the impact of increased ferry traffic in the Harbor - the last not only to us but also to all recreational boaters.

#### ACCESS

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For the most part we now use mainland launch sites at Windmill Point in Hull, Hingham Beach, and City Point in South Boston. With exception of Hingham Beach at low tide, these give us a sand or shingle beach from which we can easily launch or land our boats and where we can leave them for short periods on firm land while managing our equipment. In the past there has been little problem with auto parking at these sites, at least during the day, although it is probably due to the fact that the police are benevolent in not enforcing local restrictions. We hope that, when Gateways become active, there will not be a backlash against us in our use of these sites.

I note from your maps that some of the proposed Gateways are in locations unfamiliar to me and presume you intend to build facilities in places not now used for boating access. If possible, we would like to be able to use those Gateways also, to take advantage of secure auto parking a reasonable distance from the water, and to partake of Park services which are to be available. Secure overnight auto parking would be a distinct plus for us in order to be able to camp on the Islands without worry.

Where convenient, space on a beach near auto parking - and, hopefully, where autos can be left - will suit us fine. However, I note that several of the potential sites in Dorchester and possibly Quincy and Hingham also are in areas where mud flats occur at low tide. While ferry access, and I presume other recreational boating, will doubtless be via an extended dock at all of the Gateways, in these instances we would ask that a dock suitable to the special needs of kayaks be included. Such a dock would be low to the water - 6 to 10 inches above the water preferably, constrained so as to float up and

#### Boston Sea Kayak Club

- All the gateways shown are "potential" gateways, not "proposed" gateways. In the plan, the criteria for gateways have been elaborated to give more specific guidance to municipalities and others who may propose a site for an officially recognized gateway (GMP p. 75). Groups can assure representation of their interests by participating in the public processes for gateway designations.

down with the tide, and with enough space to manage the loading and unloading of our kayaks. In any event, marine access to and from any of the potential kayak sites ought to be arranged so that there be no conflict with larger marine traffic.

Gateways in the Inner Harbor would also need low docks as described above. However, that at Long Wharf might not be suitable for our use as the present marine traffic at that location is dense enough now that we must take special precautions merely to cross the area without interfering with commercial users of the space. I am hopeful that docks suitable for our use will be included with the marina to be built in the new waterfront as we do not have, now, a convenient place in the Inner Harbor to get off the water, to stretch, to have lunch, or to find amenities.

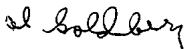
Landing on the Islands presently is no problem for us as there are ample beaches to which we can pull up our kayaks. We are encouraged by stated goals in the management plans to leave the shorelines as they are. In connection with this, I'd like to suggest that, except for Little Brewster, other islands in the Brewster group be left as they are now - quiet, remote, accessible for viewing by the public via ferry but otherwise the preserve of recreational boaters.

#### IMPACT OF INCREASED MARINE TRAFFIC

I failed to find mention of the increased marine traffic in the draft plan. While the Harbor Islands Park is quite large there will inevitably be places where ferry routes are constrained by natural features to interact with recreational, and commercial, boating. The area between Thompson and Spectacle Islands, and the Long Island Bridge, is one, Hull Gut another. Also approaches to the Gateways. There is no mention yet of the kind of ferries to be used, but I should like to comment that the new high speed commuter ferries, for example, are quite unnerving to kayakers and probably to other small craft as well. A suggestion is to mark ferry routes with navigation buoys so that other marine traffic might know to be alert and also to plan channel crossings knowledgeably.

I believe it would be good policy at this stage to make contact with other groups who use the the waters of Massachusetts Bay.

My thanks to Bill Green who took the time to bring my attention to the Draft Management Plan. As plans become firmer I'll be glad to give technical comment, or to find others with more expertise, on facilities useful both to the kayaking community and to the Boston Harbor Islands Park.

  
Al Goldberg  
Boston Sea Kayak Club

- The plan has added Appendix 17 (GMP p. 156) to show the many jurisdictions in the harbor. It is evident that much cooperation is needed between the Partnership and other agencies to assure safe and enjoyable visitor experience on the harbor islands.

August 1, 2000

Mr. George Price, Project Manager  
Boston Harbor Islands National Park Area  
408 Atlantic Avenue  
Boston, MA. 02110

Re: Boston Harbor Island National Park Area  
Draft General Management Plan and Draft Environmental  
Impact Statement  
EIS No. 000161

Dear Mr. Price:

As members of the Dorchester Community, we are grateful to have this opportunity to submit comments on the Draft General Management Plan (DGMP) and Draft Environmental Impact Statement on the Boston Harbor Island National Park Area.

The plan builds upon previous efforts by the State in the 1970's and 1990's to open up the Boston Harbor Islands as a recreational resource for the residents of the region. Minor parts of those plans were implemented but never reached the impressive addition to the region indicated in the plans. There never seemed to be enough money allocated to implement the plans. Looking back over the last thirty years raises many questions that are listed below.

With the 1996 designation as a National Park Area, what is the strategy to obtain the necessary funding to assure that the goals, standards and policies articulated in the general management will be implemented? Will lack of funding continue to be the case with the National Park Plan? We understand that this is a new form of National Park developed on a Partnership premise but still are somewhat confused about the financing, and the consistency of security and regulations as they apply to the Islands. Whose rules and regulations will apply in the park, federal, state or local? Who will implement these rules? Will they be different on each Island depending on who owns it?

Columbia/Savin Hill Civic Association  
Jones Hill Civic Association

- The final general management plan contains a new section on park financing (GMP p. 85), which expands the policy on financing including expected sources of revenue. It states the intention that major infrastructure expenses will be paid from public funds, but that funding strategies and specifics of funding are the purview of implementation plans such as the five-year strategic plan. Because public agencies generally are prohibited from committing funds in advance of appropriations, it is not possible to determine proportional contributions from federal, state, and local agencies in a long-range plan such as a general management plan.
- Partnership management policy has been elaborated in the plan (GMP p. 83) to clarify the extent of Partnership authority and the Partnership's expected role with individual island owners.

The current spending by existing agencies and the National Park Service appears to be approximately \$4.5 million per year. The implementation of the plan calls for \$7 to \$8 million in operating costs and capital costs of approximately \$65 to \$88 million to develop the preferred option. The existing DGMP lacks the specifics on how those financial goals will be reached. The plan refers to revenue generating islands but it is hard to anticipate opportunities for that much revenue while still retaining the openness and accessibility that is expected by the public. We found no reference to any legislative strategy on a local, state or federal level, which would lead to the implementation of the plan over a 5 or 10 year period. Have any ideas for off island revenue generation been considered?

We raise these questions on financing not from lack of support for the Park but from the constant frustration and disappointment caused by lack of resources. We are concerned about raising a level of expectation and once again disappointing the public

The Dorchester community is interested in designating the JFK/UMass location as an access point to the Islands. Considering that this location already has a serviceable dock, built with State funds, this site could be implemented as a location to access the island with minimal cost and time. The use of U-Mass parking facilities on the weekend could also add to the value of this site. We respectfully request that the Partnership seriously consider this as one of the first and primary gateways.

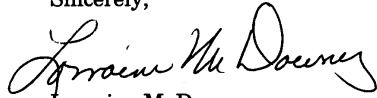
The DGMP does not present enough specifics to generate many comments. We understand that the next steps include a Strategic Plan, Economic Development Plan and an Interpretive Plan. How will the public be included in and allowed to comment on these plans. The public meeting in Dorchester was held on the Saturday of Dorchester Day weekend and also the commencement for UMass-Boston. It, therefore, was not well attended and lacked the public participation that we had hoped to generate.

The Dorchester Community is comprised of a large population of young adults that should be involved in the planning for the Park. This may require the DGMP and future steps in the process to include flexibility. This would allow some changes over time to incorporate needs of new user groups. The involvement of the community in the Economic Development Plan may also allow for some job opportunities for members of the community on the islands. As a long time member of the Columbia/Savin Hill Civic Association and President of the Jones Hill Civic Association, we expect to continue to work with the local youth to generate greater interest in involvement.

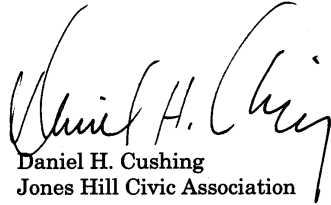
- Since publication of the draft general management plan, further work on the five-year strategic plan provides more specifics for implementing this general management plan. A summary of the strategic plan is found in Appendix 13, Implementation Phasing and Costs (GMP p.143). Also, the plan contains a new appendix, Economic Sustainability Strategy (GMP p.139), which summarizes work done since the draft plan was issued.
- Criteria for designating gateways have been added to the final general management plan (GMP p.50).

We thank you and your staff, especially Barbara Mackey and Bruce Jacobson, for all their efforts so far in this great project. We look forward to working with you in the future for implementation of the Boston Harbor Islands National Park Area.

Sincerely,



Lorraine M. Downey  
Columbia/Savin Hill  
Civic Association



Daniel H. Cushing  
Jones Hill Civic Association





Volunteers and Friends of the Boston Harbor Islands, Inc.  
349 Lincoln Street, Building 45  
Hingham, MA 02043 • 781-740-4290

Adaela McLaughlin

Project Director  
P.O. Box 5124  
Haverhill, MA 01835  
(978) 469-8324  
adaela@altavista.com

George Price, Project Manager  
Boston Harbor Islands  
408 Atlantic Ave., Suite 228  
Boston, MA 02110-3349

July 21, 2000

Dear George,

The Friends of the Boston Harbor Islands *Boston Harbor Islands Revegetation Project* (BHIRP) has reviewed the Boston Harbor Islands National Park Area Draft Management Plan and would like to provide comments. Pertinent portions of the plan were included to make it easier for BHIRP volunteers to gain the gist of the plan as it relates to us. Overall, the plan is very well written and addresses many important issues in a thoughtful manner. Revegetation with native species has been carefully included. Thank you, for this comprehensive, well-written plan. Best wishes for this undertaking.

Sincerely

*Adaela McLaughlin*

## Volunteers and Friends of the Boston Harbor Islands Revegetation Project

The "Goals and Policies" section, p. 29 lists six mission goals. Policies to assist park managers in implementation of the goal are presented after each goal. The six mission goals are **Resource Protection**; **Research and Information**; **Visitor Use, Access and Enjoyment**; **Education and Interpretation**; **Management and Operations**; **External Cooperation**. Highlighted mission goals directly affect our project.

1. The Resource Protection Goal is defined as (p.30), "The Boston Harbor Islands as a whole, containing natural, geologic, cultural, and historic resources and associated values, are protected, preserved or restored, and managed within their broader marine and coastal ecosystem and their cultural context."

**Comment:** The Resource Protection Goal sets the tone for integration of ecological and cultural resources. Philosophically, we agree with this, because everything is related, and we as humans have jurisdiction over the planet. We hope that cultural resources include a culture's thoughtful regard for their ecological resources. For instance, at the expense of the island's native ecosystems, historic and pre-historic cultural components of the park area are currently preeminent (no digging is allowed, so exotics cannot be removed, nor can plantings be made- see Comment 7). Can you please find a way to plan for adequate incorporation of all needs, both ecological and cultural? Or, can you find a way to strike a balance between the two?

The policies listed under the Resource Protection Goal are as follows (pp. 31-35). Highlighted policies are most pertinent to our project: **General Natural Resource Management**; **Restoration of Natural Systems**; **Biological Resource Management**; **Nonnative Plants and Animals**, Fire Management, Water Resources Management, Air Resource Management, Noise and Light Management, Geologic Resource Management, Soil Resource Management, General Cultural Resource Management, Treatment of Archaeological Resources, Treatment of Cultural Landscapes, Treatment of Ethnographic Resources, **Burial Sites and Cemeteries**, Treatment of Historical Properties, Museum Collections, and Carrying Capacity.

The General Natural Resource Management Policy states (p. 31): "The primary management objective for natural systems is the protection of natural resources and values for appropriate types of public enjoyment while ensuring their availability to future generations...Natural resources are managed with a concern for fundamental physical and biological processes, as well as for individual species, features, and plant and animal communities...(The waters of Boston Harbor are not included within the park boundary)"

2. Restoration of Natural Systems Policy (p. 31)-"The Partnership may re-establish natural functions and processes following human disturbance. The Partnership restores the biological and physical components of natural systems as necessary. Restoration efforts may include removal of exotic species, removal of contaminants and structures or facilities, or restoration of areas disturbed by park management or infrastructure development. [The underline was added here for highlighting.]

- The plan has added a policy on resource management planning (GMP p. 59), which will guide decisions that have to balance natural and cultural resource protection needs.

**Comment:** Is it possible to add a statement that restoration efforts may include restoration of areas disturbed by invasive exotics [as well as park management or infrastructure development]? (Plantings are separate from the removal of exotics.)

3. Biological Resource Management Policy, subheading, Native Plant Life (p.31)- "The Partnership seeks to perpetuate native plant life (such as vascular plants [this includes trees, shrubs and herbs], ferns, mosses, algae, fungi, bacteria) as part of natural ecosystems. Plants and plant communities may be manipulated only when necessary to achieve approved management objectives. Native species are restored in the park where it is determined suitable and feasible. To the maximum extent possible, plantings consist of species that are native to the park or that are historically appropriate for the period or event commemorated."

**Comment:** Which part of the planning process will determine the suitability and feasibility of restoration of native plants? See later comments 8, 9, 10 under the Management and Operations Goal.

4. Subheading, Genetic Resources (p.31)- "The partnership strives to protect the full range of genetic types (genotypes) of native plant and animal populations in the parks by perpetuating natural evolutionary processes and minimizing human interference with evolving genetic diversity."

**Comment:** Is it possible to add, "Where possible, restoration efforts shall incorporate restoration of species with most likelihood of similar genotype, including geographically similar clines?"

5. Nonnative Plants and Animals Policy (p.32)- "Nonnative plant and animal species may be removed wherever it is determined that their presence poses a threat to other park resources or to public health and safety. Control of pest species is accomplished using integrated pest management (IPM) procedures..."

**Comment:** Is it possible to add mechanical methods of removal in this section?. E.g. digging up invasive Asiatic bittersweet. (There are volunteers willing to do this.) Also, after a quick perusal of the Environmental Impact Statement, no reference to chemical applications was found. If this was not included, it should be.

6. Burial Sites and Cemeteries Policy (p.34)- "As they are identified, historic, and prehistoric burial areas- whether or not formally plotted and enclosed as cemeteries- are protected...Detailed operating procedures for the Boston Harbor Islands are developed in consultation with American Indians, appropriate state agencies including the state historic preservation office, and professional archaeologists."

**Comment:** Is the entire park area designated as a prehistoric site? What areas are designated as such? How can we obtain a quick notification of whether or not a given area is sensitive? For instance, it is not now possible to dig a spade into the soil anywhere on the islands without spending

- A list of examples has been added to the policy on restoration of natural systems (GMP p.60), which include restoration of natural systems where exotic species have dominated.

thousands of dollars for archaeologists' studies. This precludes the mechanical removal of invasive species with hand shovels. This precludes restoration plantings or plantings of any kind. This edict leaves the islands open to nonnative plant dominance. Left unchecked, without broad use of chemicals, nonnative species are rapidly choking out native vegetation. How can this situation be alleviated? Can we obtain blanket permission to dig a spade deep? Or at the very least, dig a spade length deep into areas known to have been previously disturbed by post-Indian culture? See also comment 2.

7. Management and Operations Goal (p.43)- "Each member of the Boston Harbor Islands Partnership is committed to the funding, operation, and development of the park using best management practices, systems, and technologies to accomplish the park's mission."

One of the policies listed under this goal is Management Planning. This states (p.44), "The Partnership adopts the four park planning processes applied to all units of the national park system: general management planning, strategic planning, implementation planning, and park annual performance planning. General management planning [which I assume this draft plan to be] is the first phase of tiered planning and decision-making. It focuses on why the park was established and what resource conditions and visitor experiences should be achieved and maintained over the long term."

**Comment:** Are there not times when tiered planning needs to be interwoven with concurrent planning? For instance, if the general management plan has outlined a need, and to enable this need to be met, immediate risk free actions are required, then an implementation plan should be concurrently planned with the strategic plan, and perhaps even in the draft stages of the general management plan. Concurrent planning can expedite necessary actions and needs to be planned for.

8. Subheading, Strategic Plan (p.44)- "The park strategic plan builds on the general management plan-the park mission, goals, and management areas. This process analyzes the park's capability to set and meet long-term goals in the foreseeable future through an assessment of its fiscal and human resources. This assessment also includes a description of the condition of the natural and cultural resources in the park and the capability of the park's infrastructure to meet long-term goals. This document determines the park's workload, budgets, and staffing allocations for up to a five-year period."

**Comment:** It would seem that the strategic planning process also needs to include a more specific assessment of the long-term goals delineated in the General Management Plan. Along with analyzing current conditions, there is a need for greater description of what is desired. For instance, the types and general locations of restorations desired, or the types and locations of educational programs desired need to be delineated. Then an assessment of the capability of meeting long-term goals can then be made. It would seem to follow then, that Implementation Plans would be even more specific, with, for instance, the exact location of events, a timetable, and cost analysis. Could you please include a more detailed description of the Strategic and Implementation Plans? Also, who is responsible for the strategic and implementation planning process? Are the people elected or

- The plan elaborates further on the various levels of planning (GMP p. 84).

appointed? What are the backgrounds of the personnel involved in planning? Do they have knowledge of ecological systems and horticultural/arboricultural considerations? Will the public be involved in the strategic and implementation planning process?

9. Subheading, Implementation Plans (p.44)- "Implementation planning focuses on how to carry out a specific activity or project needed to achieve a long-term goal identified in the park strategic plan. The contents of implementation plans may vary widely, depending upon whether the plan is directing a specific project (e.g. reintroducing an extirpated species or developing a trail) or an ongoing activity (e.g. maintaining an historic structure or setting and maintaining a standard for a quality visitor experience). Implementation planning is generally deferred until it is clear that the activity or project is to be undertaken within two to five years. Deferring implementation planning helps ensure that decisions about how to best achieve a certain goal are relevant, timely and based on current data."

**Comment:** It is understood that it is generally best to defer implementation planning until strategic goals are set. However, if the general management goal is set, and it is possible that a poorer quality (or even no) product can be obtained due to the waiting process, then it is deemed advisable to compromise this position and integrate concurrent implementation planning into the process. Compromises can be reached to everyone's benefit. Categorically denying compromise will at times lead to a poorer quality park in the long run. Is it possible to incorporate a process whereby the risks are weighed for early implementation of certain projects? . As an example of this, a survey of vegetation has been planned and will soon commence. Who decided that tiered planning was not necessary and early implementation was desired?

10. The section of the plan entitled, Management Alternatives, is probably the section of most interest to most people. Three alternative plans for general park usage are set forth as options A, B, and C (p.60). In general, alternative A emphasizes the natural and cultural features of the islands. This would leave the islands pretty much as they are, with for instance, the exception of some boardwalks built through saltmarshes. Alternative B emphasizes recreation. There could be fishing, shops, bike paths, lodging, etc. Alternative C increases the educational opportunities for visitors. Visitor centers, food concession stands, small concerts, boat rentals would be available.

Resource Protection is defined for each alternative as follows (from p. 62):  
Alternative A- "Some islands would be regarded unofficially as wilderness, where nature would be allowed to take over, and no visitor facilities would be provided. There would be a strong effort to reduce invasive plants and seize opportunities for revegetation on a number of the islands. Trails would be developed and maintained to encourage visitors to avoid compacting soil off trails. Small boardwalks would be built through portions of saltmarshes. At Peddocks, the landscape would be rehabilitated after cottages were removed. Islands with disturbance-sensitive species would be closed to visitors during the nesting and fledging seasons. And other areas might be closed or restricted to protect threatened and endangered species. "

Alternative B- " Some small islands, such as Snake, Sheep, Green, Calf, Little Calf, and Hangman, may be highly restricted to protect habitat. To accommodate visitors in other areas, many trails would be developed to encourage visitors to keep to trails and avoid unnecessary soil compaction.

- To clarify the role of the public, the plan has new language on management planning (GMP p. 84) identifying the Advisory Council as the main outreach arm of the park, leading and participating in public reviews of park plans.

Extensive boardwalks would be built through salt marshes. More vegetation management may be done to enhance visitor access than in other alternatives.”

Alternative C- “Some small islands, such as Snake, Sheep, Hangman, Green, Calf, Little Calf, Middle Brewster, and Outer Brewster, may be closed (or have seasonal restrictions) to protect habitat or nesting sites of wildlife that are disturbed by human presence. Efforts would be made to reduce invasive plants in certain designated places, and to undertake a long-term revegetation program with appropriate species. Vegetation would be managed for habitat health and to maintain established views or to open up new views where appropriate. Sufficient trails would be developed and maintained to keep visitors on established pathways rather than wandering and increasing soil compaction. Boardwalks would be built through saltmarshes. Particular effort would be made to engage the public in stewardship of resources.”

Management Areas are addressed and are applicable to each alternative (p.53). These include Mainland Gateways, Visitor Services and Park Facilities, Historic Preservation, **Managed Landscape Areas, Natural Features Areas**, and Special Uses Areas. (p. 53). The definition of each area remains the same for each alternative.

Managed Landscape Areas are defined as landscapes “managed to preserve their character-defining cultural and natural features (p. 53).” There would be “moderate visitor density with a likelihood of encountering others, but opportunities for solitude are available at certain times.” The “setting is predominantly open space, but visitors have the comfort of certain amenities. Resources are managed to allow appropriate recreational uses, maintain viewsheds, and prevent erosion of shorelines. Landscapes are maintained to provide recreational facilities and minimal visitor amenities. Primary treatment for historic resources is preservation or mitigation of negative impacts through appropriate documentation. Critical or sensitive natural resources and habitats are fully protected. Staffed according to level of use.”

**Very Important Comment:** Alternatives A, B, and C all consider Bumpkin, Deer, Gallop, Grape, Long, Lovells, Nut, Spectacle and Webb to be managed landscapes where their open space character would be preserved (from p. 61). Is it possible to incorporate the restoration of native species in Managed Landscape Areas, similar to the Natural Features Areas? If alternative A is chosen, those seeking solitude and a spiritual experience should have the opportunity of experiencing a native woodland area. If alternative C is chosen, an educational emphasis should give island visitors a taste of what the native forest on these islands was like. Invasive exotics should also be removed where appropriate. These are now choking out or eating (rabbits) much of the vegetation.

**Comment:** It is suggested that further descriptions of Managed Landscapes be included. What is meant here by the term “open space?” See pp. 53 and 61. Is this the usual definition of not built upon, or does it mean wide open, treeless or small-tree meadows? If the latter, this should be stated. What types of ecological communities, paths and campsites will be featured? Will meadow, forest or marsh ecological communities be dominant? In what proportion? If forests are incorporated, what type of forest? E.g. oak-hickory, sand plain, or introduced exotic species? Will paths be narrow, wide, dirt, mowed grass or paved? Some people would like to see more narrow paths to provide

- The plan includes restoration of “native species where appropriate” in the list of potential management activity for managed landscapes (GMP p.53), and the environmental impact statement has been modified to reflect this change (EIS p.104).

greater intimacy with their surroundings. If you feel that the general management plan is not the place for these specifics can you state that these will be investigated and incorporated into the strategic planning process?

11. Natural Features Areas emphasis (p. 53) is defined as areas where “natural processes dominate.” The “landscape generally appears to have been affected primarily by the forces of nature or to reflect significant ecological features. Imprint of human influence is substantially unnoticeable. Low visitor density with opportunities for solitude. Immersion in a natural landscape. Opportunities for challenge and adventure. Requires self-reliance. Minimal development and human intrusion into naturally functioning systems and processes. Negative impacts on cultural resources are mitigated through appropriate documentation. Natural resources managed for ecosystem protection. **Restoration of native species where appropriate. Habitat and species restoration. Invasive exotic species control (where appropriate and practicable).** Some areas are closed to general public access for resource protection. Not staffed.”

**Comment:** All three management alternatives consider Middle and Outer Brewster Islands, Hangman, Raccoon, Sheep, and Slate to have Natural Features emphasis. The restoration aspects of the Natural Features Areas emphasis should be applied also to the Managed Landscapes Areas emphasis.

- The plan includes restoration of “native species where appropriate” in the list of future resource conditions for managed landscapes (GMP p.53).



### Volunteers and Friends of Boston Harbor Islands, Inc.

349 Lincoln Street, Building 45 • Hingham, Massachusetts 02043-1601  
781-740-4290 • Fax 781-749-9924 • E-mail: fbhi@juno.com

July 31, 2000

Mr. George Price, Project Manager  
Boston Harbor Islands National Park Area  
408 Atlantic Avenue, Suite 228  
Boston, MA 02110

RE: Comments on the Draft General Management Plan and Draft Environmental Impact Statement for the Boston Harbor Islands National Park Area

Dear George:

Representatives of The Volunteers and Friends of the Boston Harbor Islands Inc. have been active participants in the process to develop the Draft General Management Plan and Draft Environmental Impact Statement since the Project's inception. We anticipate the organization's continued commitment during the implementation phase of the Plan. This commitment is based on our track record of twenty-one years of public service and stewardship of the islands. Page IV of the Draft Plan states... "Efforts would be made to engage volunteers in stewardship of resources." This has been the FRIENDS reason for being. They are the core public constituency for the islands, and the Volunteers are a critical human resource in the day to day operation of the Park. The FRIENDS have a unique and valuable perspective on park management to bring to the Partnership, as the planning process becomes more focused and project specific.

There is a lack of official acknowledgement of the FRIENDS many contributions to the National Park Area and individual Partnership members in the Draft GMP/EIS. The FRIENDS provide critically needed Volunteer Services that amount to more than 11,000 man hours annually (valued for NPS purposes at more than \$110,000 annually). They also provide direct feedback to the Partnership and its committees on the park visitor experience and operational issues.

The FRIENDS support the overall scope of Alternative C. We understand that the final General Management Plan will only serve as a policy document for the Park. The day-to-day operational issues that have been brought to the Partnership will be addressed in the Strategic Management Plan now being developed. Our representatives are also active participants in this planning process, and we encourage opportunities for widespread public review of this document before it is finalized.

Separate comments on the Draft GMP/EIS from the FRIENDS Revegetation Project volunteers have been mailed to you.

During the eight Advisory Council public workshops on the Draft GMP/EIS, most of the comments and questions had to do with basic operational issues and concerns by park users. The following are key issues that the FRIENDS will continue to monitor and advocate for:

- Complete Natural and Cultural Resource inventories to inform management and operational decisions; incorporate public input during these studies.
- Ensure that the individual island visitation levels are appropriate based on identified carrying capacity, and adequate visitor amenities are provided.

### Volunteers and Friends of Boston Harbor Islands, Inc.

- A new section emphasizes the importance of volunteers and recognizes the Friends of the Boston Harbor Islands (GMP p.97).



**COMMENT**

**NOTES on GMP and EIS CHANGES**



*INDEPENDENT LIVING CENTER  
of the North Shore and Cape Ann, Inc.*

## SERVING:

Beverly  
Danvers  
Essex  
Gloucester  
Hamilton  
Ipswich  
Lynn  
Lynnfield  
Manchester  
By-The-Sea  
Marblehead  
Nahant  
Peabody  
Rockport  
Rowley  
Salem

June 19, 2000

George Price, Project Manager  
Boston Harbor Islands National Park Area  
408 Atlantic Ave., Suite 228  
Boston, MA 02110

Saugus  
Swampscott  
Topsfield  
Wenham

Dear Mr. Price,

The Independent Living Center of the North Shore & Cape Ann, Inc. (ILCNSCA) in Salem is a non-profit service and advocacy center that is run by and for people with disabilities. We serve people with disabilities in 19 cities and towns on the North Shore and Cape Ann areas and we assist people to live as independently as possible in their community. While offering independent living skills training, peer counseling, information & referral and advocacy, the ILCNSCA also provides technical assistance to the community regarding accessibility regulations of the Massachusetts Architectural Access Board (AAB) and the Americans with Disabilities Act (ADA).

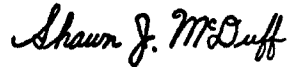
ILCNSCA appreciates the Boston Harbor Islands Partnership's stated commitment to make every reasonable effort to make the facilities, transportation systems, programs, and services of the Boston Harbor Islands usable by all people, including people with disabilities. Under the Accessibility statement on page 39 of the Boston Harbor Islands Plan it is noted that determination of what is reasonable is made only after careful consultation with disabled persons or their representatives. We consider our agency to be a strong voice representing people with disabilities on the North Shore and Cape Ann and would like to play an integral part in working with the Partnership to ensure that proper accessibility is achieved.

*"OUR GREATEST NEED AS HUMAN BEINGS IS THE FREEDOM TO PURSUE OUR DREAMS"*

**Independent Living Center of the North Shore and Cape Ann, Inc.**

Please contact ILCNSCA Access Specialist, Art Daignault, to discuss our participation in this exciting project. He is available at (978) 741-0077 (V/TTY) on Tuesday, Wednesday and Thursday from 9:00 a.m. – 4:00 p.m. or Friday from 9:00 a.m. – 3:00 p.m. Thank you for your time.

Sincerely,



Shawn J. McDuff  
Access & Resource Coordinator

CC: Mary Margaret Moore, Executive Director, ILCNSCA  
Art Daignault, Access Specialist, ILCNSCA  
Stanley Usovich, Mayor, City of Salem  
Elizabeth Rennard, ADA Coordinator, City of Salem  
Scott Maguire, Co-Chairperson, Salem Commission on Disabilities  
Jack Harris, Co-Chairperson, Salem Commission on Disabilities  
Valerie Fletcher, New England ADA Technical Assistance Center  
File



Massachusetts Audubon Society  
208 South Great Road  
Lincoln, Massachusetts 01773  
(781) 259-9500

July 28, 2000

George Price, Project Manager  
Boston Harbor Islands  
408 Atlantic Ave., Suite 228  
Boston, MA 02110-3349

Re: Draft General Management Plan/Draft Environmental Impact Statement

Dear Mr. Price:

On behalf of the Massachusetts Audubon Society, I submit the following comments on the Draft General Management Plan/Draft Environmental Impact Statement for the Boston Harbor Islands National Park Area.

This document is an important step toward unified management of the Boston Harbor Islands, with their diverse ownership. We understand that the plan presents policy-level guidelines, rather than site-specific or project level plans. We generally support this planning approach as appropriate for this stage in management of the harbor islands. However, we are concerned that some of the development envisioned in the document, along with a major increase in the level of recreational visitation to the islands, has significant potential for degradation of important natural resources. Although no comprehensive inventory of wildlife habitat (including marine habitat) has been completed, the plan describes specific development on particular islands and even suggests that visitor demand may result in increased impact on wildlife habitat in the future. Both individual development project and general increases in recreational use should come after, not before, natural resources inventory and protection planning. Some of the more sensitive locations are known, and the plan calls for these areas to be excluded from any future development. Nevertheless, the level of ecological inventory conducted to date is an inadequate foundation upon which to implement the proposed projects and uses. Without more detailed natural resources inventory information, it is impossible to determine the carrying capacity and ensure that it is not exceeded (as promised in the plan).

In our review of the Boston Harbor Islands Draft General Management Plan and Draft Environmental Impact Statement (EIS), we have focused on the EIS Affected Environment and Environmental Consequences section. The Affected Environment section is very general, while the Environmental Consequences Summary of Management Alternatives section is very specific. There seems to be little evidence of a thorough biological survey. While rare species are mentioned, the information is anecdotal. Their use of habitat and needs have not been well documented. Unusual habitats are mentioned, but not described in detail. While use of the islands by migratory birds is mentioned, use of particular

Massachusetts Audubon Society

islands and habitats is not identified. Nesting terns are mentioned, but the extent of their breeding colonies and areas of use on particular islands is not. There seems to be even less detailed information about marine resources; a critical omission on islands where much of the public attraction is marine life.

All of this would be expected in a preliminary plan if detailed resource inventories were identified as the next step, followed by decisions about types and location of facilities. However, the present alternatives are specific about types of facilities on particular islands and even state in several places

The preferred alternative often seems to be driven by future unknowable visitor demand over the value of protecting wildlife. An example is on page 105 at the end of the wildlife section, "However, if visitor demand increases, additional hub islands would be developed and some wildlife habitat removed in those areas." This is vague and does not speak to protecting wildlife habitat over visitor demand. What kind of visitor demand? Wouldn't increased demand for, say more paved trails detract from the attraction of wildlife for other visitors? On page 106, the wording is different, but the intent is the same under Wetland and Aquatic Marine Life. "If visitor use increases, access to other islands will be created and populations of these species will experience impact." The loss or degradation of important wildlife habitat would be contrary to the carrying capacity principles espoused elsewhere in the plan.

#### RECOMMENDATIONS

Therefore, we respectfully offer the following recommendations for strengthening the natural resource protection program and policy sections of the document.

**No construction projects should proceed toward detailed planning (and certainly not development) until detailed ecological inventory information is gathered, in all seasons, at the site and the immediate surrounding area.** Wildlife should take a higher priority in future decision-making about the island use. The plan only addresses this issue in relation to rare species, for example on page 106, the plan states "Surveys to locate all patches of Sea-beach Dock will be required before development of these facilities [on Peddock's Island] can begin. This is necessary but far from sufficient. Detailed habitat inventories should be conducted at all locations before development is considered, taking into account both rare species and other habitat features that are important to wildlife generally (even though such habitats may not specifically be rare species habitat). We recognize that there may be some natural resource inventory information already available; this should be compiled in one location and utilized as planning moves forward. **The plan should clearly state that detailed ecological inventories will be conducted in and around any proposed development site at the earliest stages of project planning.**

**Immediate priority should be given to increasing the level of staff and/or volunteer oversight of critical areas such as nesting sites for terns and other coastal waterbirds.** Each of these locations should be monitored daily during the nesting season. Signs should be posted and informational materials handed out to any visitors who (perhaps inadvertently) intrude upon these areas. Massachusetts Audubon's Coastal Waterbird Program effectively utilizes volunteers and interns to provide this function at a majority of coastal waterbird breeding sites in the state. We would be happy to share our experience and methods with you for implementation of a similar program on the islands.

**Informational materials should be developed and made prominently available to all visitors, educating them on the ecological resources of the islands and asking for voluntary compliance with protective measures.** These materials should not be limited to bird habitat, but also include other issues of concern such as trampling of sensitive vegetation and erosion prone areas, harassment of resting seals, and

- The statement on page 105 is unclear and has been deleted in the GMP. In an amplification of the policy on visitor access, use, and enjoyment, the Partnership's responsibility for resource protection is identified as "paramount" GMP p.73).
- The plan contains an expanded description of implementation plans which strengthens the language on conducting environmental review prior to implementation (p.84).

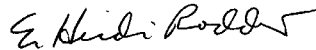
eelgrass damage from boats. **These educational materials should be developed and made available before any significant increase in recreational visitation is encouraged.**

**More detailed and creative mitigation measures should be considered.** For example, on page 107, Barn Owls are described as using buildings and old fortifications on the islands. Barn Owls are known to use nestboxes (as at MAS Felix Neck Wildlife Sanctuary). Placing nestboxes on the islands would be allow Barn Owls to continue to use the islands after buildings are repaired or demolished. Nestboxes should be put in place well before demolition or renovation is undertaken.

In conclusion, we recommend that the immediate priority be placed on conducting substantial additional natural resources inventory and visitor management programs prior to development project planning or promotion of increased visitation. This is not intended as a criticism of the overall program, which we generally support. Rather, we highlight the need for adequate funding for resource inventory and protection in order to ensure that the Harbor Islands continue to serve as vital wildlife habitats while the public enjoys enhanced facilities, use, and appreciation of these natural treasures.

Thank you for the opportunity to comment.

Sincerely,



E. Heidi Roddis  
Senior Policy Specialist

cc: Mary Foley, National Park Service  
Peter Webber, Commissioner, Department of Environmental Management  
David Balfor, Commissioner, Metropolitan District Commission  
Tom Skinner, Coastal Zone Management  
Richard Howe, The Trustees of Reservations  
Rob Moir, Save the Harbor/Save the Bay  
Jay McCaffrey, Massachusetts Sierra Club

**Joseph C. Beckmann**

22 Stone Avenue, Somerville, MA 02143 617-625-9369 [joseph@eekos.org](mailto:joseph@eekos.org)

31 July 2000

Mr. George Price, Project Manager  
Boston Harbor Islands National Park Area  
408 Atlantic Avenue, Suite 228  
Boston, Massachusetts 02110

Re: Comment on Draft Plan, Boston Harbor Islands National Park

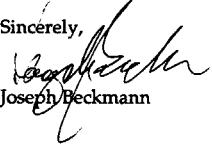
Dear Mr. Price:

I represent members of the Mystic View Task Force, a coalition concerned with the development of the current Assembly Square in Somerville. The Task Force strongly supports your Alternative C, because of its balance of environmental, recreational, and community uses of the Harbor Islands National Park.

The only element we would change is to designate Assembly Square/Mystic View as another gateway. The site, above and below the Amelia Earhart Dam on the Mystic River, is closer than some of your identified gateways, and part of \$20 billion in transportation infrastructure of highways, mass transit, and suburban transit lines. It is more accessible to more points than any of the other gateways in your plan, and is currently being considered by the MBTA, the City of Somerville, the MDC and others for a water taxi to Logan, an expanded riverfront park and marina, as well as additional subway and suburban train stations. As a gateway to the Harbor Islands, Assembly Square will give the Islands direct river access to suburban communities as far as Arlington, industrial and office sites as far as Melrose and Malden (Telecom City), and recreational and commercial sites in Cambridge and Everett otherwise inaccessible to parking and public transport.

Assembly Square would serve the same function with Alternatives A or B, but the mix of purposes we advocate for the Square have more in common with your proposed and preferred mix in Alternative C. There have been site studies by our group, by the city, and there is a current study now being reviewed prepared by the Cecil Group. We could share any of these studies, at your convenience.

Sincerely,

  
Joseph Beckmann

**Mystic View Task Force**

- All the gateways shown are “potential” gateways, not “proposed” gateways. In the plan, the criteria for gateways have been elaborated to give more specific guidance to municipalities and others who may propose a site for an officially recognized gateway (GMP p. 75). Groups can assure representation of their interests by participating in the public processes for gateway designations.

## Mystic View Task Force

www.the-ville.com/mysticview  
c/o 25 Hancock Street  
Somerville MA 02144

August 1, 2000

Mr. George Price  
Project Manager  
Boston Harbor Islands  
408 Atlantic Avenue, Suite 228  
Boston, MA 02110-3349

Re: Public comments on the Draft Environmental Impact Statement on the Boston Harbor Islands  
Dear Mr. Price:

On behalf of the Mystic View Task Force I am writing you because I note that the summary of "possible gateways" does not mention Somerville. **The Task Force believes that the Assembly Square area of Somerville on the Mystic River would be an excellent gateway.** This site has excellent potential for intermodal connections. These include:

- an Orange Line subway running at grade through the site;
- three commuter rail lines running through the site;
- Urban Ring plans showing a stop on the site;
- two MBTA buses and Somerville's Crosstown Shuttle currently serving the site;
- bicycle and pedestrian connections being planned from points north and south along the river and from the rest of the Somerville into the site
- access from Interstate 93 and the Fellsway

Other relevant information about the Assembly Square site, which is a little more than two miles from Boston City Hall, includes the following:

- In April 2000, Tufts University announced its commitment to work with the Mystic River Watershed Association, the Massachusetts Office of Environmental Affairs and the EPA to clean up the 76 miles of the Mystic River by 2010.
- This July, the Mystic River Watershed Association announced the beginning of its Mystic Monitoring Network, a coordinated water sampling program performed by volunteers.
- This spring the Massachusetts House and Senate have passed a line item for an MDC planning study/survey of parkland in the vicinity of Assembly Square on both sides of the river.
- The City of Somerville is in the process of completing a planning study of the Assembly Square area, and along with the Mystic View Task Force, the City has been working diligently to ensure the building of an Orange Line T stop at Assembly Square site, to increase intermodal transportation opportunities, and to increase and improve open space along the riverfront.
- The Amelia Earhart Dam, which is located at the site, is at a critical junction on the Mystic River separating fresh water and salt water.

For more information about the Assembly Square area of Somerville, you may check our web site: <http://www.the-ville.com/mysticview>. I can be reached at (617) 776-0945.

Sincerely,



Jane Sauer, Member  
Mystic View Task Force Coordinating Committee

*The mission of the Mystic View Task Force is to promote community participation in planning the development of the Mystic View/Assembly Square area to assure the greatest benefit to the people of Somerville.*

David Dahlbacka, <i>President</i>	Lawrence Paolella, <i>Treasurer</i>	Lynn McWhood, <i>Secretary</i>
(617) 776-0945 • ddahlbac@ix.netcom.com	(617) 628-8126 • poetrypiza@aol.com	(617) 623-8751 • linwoodplace@earthlink.net

## Mystic View Task Force

- All the gateways shown are "potential" gateways, not "proposed" gateways. In the plan, the criteria for gateways have been elaborated to give more specific guidance to municipalities and others who may propose a site for an officially recognized gateway. Groups can assure representation of their interests by participating in the public processes for gateway designations.



## NATIONAL PARKS CONSERVATION ASSOCIATION

*Protecting Parks for Future Generations*

July 26, 2000

George Price  
Project Manager  
Boston Harbor Islands National Recreation Area  
408 Atlantic Avenue  
Boston, MA 02110

Dear Mr. Price:

The National Parks Conservation Association (NPCA) is pleased to submit these comments on the Draft General Management Plan (GMP) and Draft Environmental Impact Statement (EIS) for Boston Harbor Islands National Recreation Area. The document provides an evolving overview of the guiding principles for protecting and enjoying the islands, potential management alternatives, and what role the partnership will have in interpreting, funding, and safeguarding the islands' future. NPCA is America's only private, nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the National Park System. NPCA was founded in 1919 and today has more than 400,000 members—more than 12,900 of whom are Massachusetts residents.

**General Comments**

NPCA wishes to stress the importance of the Boston Harbor Islands Partnership (BHIP) to maintain the high standards for resource protection, interpretation, and visitor use inherent to the National Park System and its establishing legislation. Although the GMP is a general policy document, guiding principles for the park must be strongly articulated and effective. While the overall goals of BHIP are positive, NPCA finds weaknesses in the stated significance of the park, the clarity and purpose of the proposed management zones, funding criteria, and the projected carrying capacity for the park. Each of these factors could have negative effects on the overall character, resources, and intended visitor experience at Boston Harbor Islands. Stated simply, if the park is meant to be part of the National Park System—as its enabling legislation indicates—stakeholders in BHIP must ensure that the General Management Plan is consistent with the standards upheld by similar documents at all other units of the National Park System. This will be especially challenging, given the unique structure and multifaceted mission of the Boston Harbor Islands National Recreation Area (BHINRA) as proposed, compared with other, more traditional units.

While the park will reap public benefits from being designated as part of the National Park System, NPCA finds long-term problems with the understated role of the National Park Service in the Boston Harbor Islands Partnership. These complications, caused by ambiguity in leadership, will weaken other areas of planning, law enforcement, management, and resource protection at the different islands.

**Significance of the Park**

The GMP must more specifically address how the local and regional significance of the Boston Harbor Islands enhances and connects with the purpose of the entire National Park System. How do the resources found at the state, local, and city level further complete a national context for visitors from Kansas, upstate Maine, or Tokyo? How does the islands' location to an urban area differentiate them and make them more nationally significant than, say, a cluster of islands in Puget Sound or San Francisco Bay—where surely similar cultural and natural forces have shaped the islands and similar recreational opportunities can be

## National Parks Conservation Association

NORTHEAST REGIONAL OFFICE  
41 Winter Street, Suite 403 • Boston, MA 02109  
(617) 338-0126 • Fax (617) 338-0232  
northeast@npca.org • www.npca.org



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NATIONAL OFFICE  
1300 19th Street, N.W. • Washington, D.C. 20036  
(202) 223-NPCA(6722) • Fax (202) 659-0650  
npca@npca.org • www.npca.org

found? Specific examples must be provided to attest to the national, and perhaps even global, significance of Boston Harbor Islands. As the GMP reads, the resources found at Boston Harbor Islands appear to be more significant on a state or city level, rather than meaningful within a national context.

In addition, significance of Native American life and use on the islands should be integral could be a more prevalent in all aspects of interpretation, not merely random additions to interpretational vignettes where a Native American presence is most apparent. This most likely will require thorough and continuous archaeological work and interaction with existing tribal groups on park planning, interpretation, and resource protection, but it will provide a much-needed perspective on Native American culture and history that is noticeably lacking at many other park units on the East coast.

#### Management Areas

Management areas for the park must be more strongly defined and include options for how the islands' different managers will regulate and enforce the islands' unique characteristics, special resource protection needs, and various recreational limitations. Distinct guiding principles will help the partnership focus on ideal future conditions for the park that are clear—both to each island's management entity and to visitors. While a less "rigidly defined" (p. 50) framework for management areas seems appealing and more creative, it provides an unstructured and potentially contentious backdrop for dealing with conflicting visitor uses, law enforcement issues, and the challenges of infrastructure planning. A more educated visitor constituency, armed with a clear understanding of the structure and purpose of the park, will actually help the partnership fulfill its preservation and interpretive mission. In addition, the GMP must specifically define the term "recreation," where certain types of recreation are appropriate, and when visitors can enjoy them. The explanation of recreation must also include definitions for "enjoyment" and "impairment" as outlined in the pending Management Policies. It could then be further specified which recreational activities are appropriate for each island, but all activities should adhere to the basic standards set in the general definition of "recreation." This will simplify the job of defining the types of visitor experiences that can be found on respective islands and perhaps prevent disappointment among the public.

The partnership must clearly address in the GMP how it will mitigate conflicting visitor uses, especially since the park has no jurisdiction over the waterways of Boston Harbor. For example, the potential for personal watercraft (PWC) noise and commotion to infringe on the tranquility and natural sounds of less-developed islands is considerable. PWC noise is very different than that of a passing boat or plane: it is a high-pitched, fluctuating whine that is augmented by how the craft are typically used. Most PWC users seek waves to jump and stationary objects to circle, and Boston Harbor is an ideal environment for this type of aggressive activity. The park must be able to mitigate park user conflicts effectively so that all visitors have a satisfactory park experience. As currently written, personal watercraft use is in direct conflict with all of the activities listed under "Managed Landscapes" (p. 55)—meaning enjoyment of these activities could be severely compromised by personal watercraft activity nearby. Yet "motor boating" is listed amidst these activities as appropriate for this type of management area. The GMP should state that the partnership will establish appropriate relationships with state officials necessary to mitigate user conflicts.

NPCA strongly opposes inclusion of islands that are sites for sewage treatment plants, police shooting ranges, fire fighting training, and other activities that are not directly related to the cultural and natural resource protection goals of the park. Regardless of their relevance to urban living, these activities do not contribute to the public's understanding of the national and cultural significance of the islands and are inappropriate for inclusion in a national park. They should be separately managed and interpreted for the public through city or state administration. These are local government functions and services that do not belong within a unit of the federal government.

Given the patchwork style of proposed island management, the partnership must ensure that the GMP articulates how the interpretation of each island will be consistent not only within context of other islands, but also within the standards of the National Park System as a whole. How will these management areas compare—both from the visitor perspective and for resource protection goals—with similar interpreted areas elsewhere in the park system? Although the islands are a unique entity, the standards used in interpretation and resource protection must be concordant with the scrupulous principles outlined in the National Park Service's Organic Act of 1916 and its Management Policies. In addition, the GMP must

- The general management plan contains expanded material on Native Americans, notably a new section in the park setting (GMP p.4) as well as integrated throughout the plan.
- The plan contains revisions in descriptions of management areas, which serve to give more definition and guidance for managers (GMP p. 52).
- While the resolution of conflicting visitor uses is an activity for park managers, the plan now contains additional guidance about water-based recreation (GMP p. 97).

clearly describe how the park will equalize for visitors the two competing perspectives of the islands—as recreational grounds and as a natural sanctuary from urban life—through strong interpretive goals. One use or purpose of the park should not defeat another.

#### Financial Structure

The partnership must not allow financial capabilities—or lack thereof—of any one stakeholder to drive decision making, planning, development, research, or interpretation within the park. Competing interests for the islands will surely emerge over time, given the multifarious nature of the management structure, location, purpose, and public perception of the park. However, NPCA urges the partnership to clearly articulate visitor experience goals, resource protection objectives, and infrastructure proposals in the GMP, regardless of what monies are available. The partnership must also work closely with the Boston Harbor Islands Alliance to ensure that funds are properly attained and dispensed with resource protection and the visitor experience as priorities. If limits are placed on sources of funding, these limits should be stated clearly and thoroughly within the financial section of the GMP. Acknowledgement of private funding sources at the islands should be in keeping with the standards established throughout the National Park System.

The GMP should dedicate specific funding to implement a diversity program that will increase multicultural participation within Boston Harbor Islands National Recreation Area. It is estimated that the cost of the GMP will be between \$7 and 9 million. Given this figure, sufficient funds should be allocated to the diversity program and to a board that will oversee its creation, implementation, and continuation.

#### Carrying Capacity

The GMP states that park infrastructure will be the “only development” for the islands, but goes on to list one of the main purposes for development is to accommodate “an increasing number of visitors.” The GMP must provide a distinct carrying capacity for each island based upon the intended visitor experience for each island and its inherent resource protection needs as guidelines. The GMP must also clearly describe a system for evaluating and monitoring these carrying capacities over time, as popularity of the islands may increase or as new recreational pressures may put demands on island resources. This is a crucial element of the GMP for Boston Harbor Islands because of the limitations on regulation, enforcement, and lack of controlled access to much of the water area surrounding the islands. The GMP should make clear that any development or expansion of facilities to accommodate “an increasing number of visitors” will occur only after capacity determination and monitoring systems have been established. Moreover, carrying capacity must not be determined by the “capacity and frequency of ferry and water shuttle service to the islands” (p. 37).

#### Other Concerns

The GMP must make a clear distinction between “water transportation” (p. 39) and water-based recreation. By claiming that general “water transportation contributes to the overall visitor experience,” the document allows for activities such as PWC use to be interpreted as a means of necessary transportation, when clearly it is a recreational pastime that can infringe on other visitor enjoyment of the islands. The PWC and snowmobile industries have used this transportation argument when pressuring other national parks to open up areas to motorized use.

Under “Noise and Light Management” (p. 33), the draft GMP is vague in describing how and when noise intrusions will be mitigated. “Whenever practical” or “as necessary” (p. 32) are unacceptable mitigation criteria when dealing with the values and resources within a national park unit. Using National Park Service standards, the GMP for Boston Harbor Islands should develop and implement a comprehensive background noise and light monitoring program. Resource managers at islands with themes focusing on the natural landscape and natural sounds will be able to use this monitoring program to measure and mitigate noise and light pollution that may be negatively affecting the visitor experience in these management zones.

The partnership must do more than “encourage” scientific researchers to follow NPS standards (p. 36). The National Park Service must play an integral role in helping researchers develop study plans and advise on work contracts that support park resource protection and cultural resource preservation on the islands. Likewise, the partnership—with the Park Service as the lead voice—must be more aggressive in

- Since publication of the draft general management plan, further work on the five-year strategic plan provides more specifics for implementing this general management plan. A summary of the strategic plan is found in Appendix 13, Implementation Phasing and Costs (GMP p.143). Also, the plan contains an expanded section on park financing (GMP p.85) and a new appendix, Economic Sustainability Strategy (GMP p.139), which summarizes work done since the draft plan was issued.
- The distinction has been made in the new section on water-based recreation (GMP p. 97).
- The policy statement on noise and light management (GMP p.63) has been strengthened to address this point.
- The statement in the plan eliminates the idea that following NPS standards by researchers is optional (GMP p.68).

participating in private sector development plans to ensure that these plans fully support resource stewardship and the interpretive goals of the park.

The GMP is weak in describing the kinds of retail sales and commercial service contracts that will be part of the island experience. The GMP should clearly illustrate what kinds of retail services, where they will be located, and the themes these services will offer visitors. Retail merchandise should be relevant to island natural and cultural history only. "Rental facilities for water sports" (p. 59)—of what sort? Any motorized activities must be carefully designated and routes for travel restricted from areas that promote tranquility and close communion with natural sights and sounds.

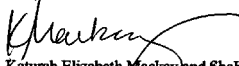
"Ferry trips to the islands usually include narration developed by the ferry operator rather than the park" (p. 41). NPCA strongly supports the use of National Park Service interpretation expertise in the development of ferry narration. Ferry narration, however should only be one element of an interpretive program for the BHINRA. In a unit as diverse and disconnected as BHINRA, it is critical that there be consistency in the substance and presentation of information to the public. We believe that a Comprehensive Interpretive Plan (CIP) should be developed for BHINRA following the issuance of the final GMP. The CIP should address all aspects of visitor education and information including ferry boat narration, signage, brochures, exhibits, tours and school programs and adhere to NPS standards.

The GMP must articulate which law—city, state, or federal—holds more authority concerning disputes within the park (p. 44) and how those disputes will be handled with protection of national park resources as a priority.

In comparing the different alternatives, the draft GMP fails to clearly distinguish between Alternatives A, B, and C. Inconsistencies exist regarding the evaluation and interpretation of archaeological sites, what types of visitor activities will be promoted and where, and how the park will offer "abundant opportunities for solitude" (p. 60) given the urban nature of the islands. Moreover, why is the anticipated amount for studies and research (approximately \$4 million) in Alternative A the same as in the other two alternatives, if Alternative A is the option that provides the most resource protection for the islands? Shouldn't this figure be proportionately greater than those in the other two alternatives?

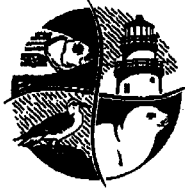
NPCA appreciates the opportunity to participate in the planning for Boston Harbor Islands National Recreation Area. We look forward to being a part of the process as it continues to move forward. Please call if you have any questions regarding our comments.

Best,



Katurah Elizabeth Mackay and ShaKing Alston, for Eileen Woodford  
National Parks Conservation Association  
Northeast Regional Office

- The plan addresses revenue generation in a new section (GMP p.86).
- The plan now contains a comprehensive interpretive plan, Appendix 18 (GMP p.161).
- An additional appendix (Appendix 17, GMP p. 156) is contained in the plan which helps explain the variety of agencies and authorities with jurisdiction in the harbor.



**Save the Harbor  
Save the Bay**  
Founded 1986

August 1, 2000

George Price  
Park Manager  
Boston Harbor Islands National Park  
408 Atlantic Avenue  
Second Floor, Suite 228  
Boston, MA 02110

Dear Mr. Price:

As an early advocate for the creation of the Boston Harbor Islands National Park (BHINP), we have always felt that the best way to keep the harbor clean forever is to share it with the public.

That's why Save the Harbor/Save the Bay supports Alternative C of the Draft General Management Plan as an appropriately balanced conceptual structure for the "Reconnection and Renewal for the Islands and Us."

From experience we know that connecting communities with the harbor by bringing people to the shoreline, onto the water, and out to the islands is the best way to build the sense of stewardship we need to accomplish our mission and make sure that this time the harbor stays clean forever.

It is in that context that we offer the following specific comments.

The General Management Plan could be improved by enlarging the scope of the "gateway" concept to include smaller "feeder docks" with connections to the park through the larger gateways. Waterfront communities like Chelsea (perhaps somewhere on Chelsea Creek) and Somerville (perhaps at the Amelia Earhardt Dam at the mouth of the Mystic River) deserve to be explicitly included.

After all, every MWRA community has paid for the clean-up of the Boston Harbor. These ratepayers who paid nearly \$4 billion in higher sewer and water rates to restore the Harbor should now have access to the resources they paid to restore.

39 TEMPLE PLACE, SUITE 304 • BOSTON, MASSACHUSETTS 02111 • TELEPHONE: (617) 451-3860 • FAX: (617) 451-8498



Save the Harbor, Save the Bay

- The general management plan broadens the description of gateways and refers to docks which feed visitors to official gateways (GMP p. 75). All the gateways shown are "potential" gateways, not "proposed" gateways. The criteria for gateways have been elaborated to give more specific guidance to municipalities and others who may propose a site for an officially recognized gateway. Groups can assure representation of their interests by participating in the public processes for gateway designations.

We would like to see a strong commitment to those upland communities which are not situated right on the harbor, yet are part of the MWRA region. The BHINP is a resource which should be enjoyed by people from all walks of life: young or old, and from every socioeconomic background.

The BHINP should not begin just at the kiosks, information centers and boat docks at the designated gateways but should extend into our communities and neighborhoods themselves (at community centers, schools, public buildings, other parks, MBTA stations, etc.).

Signage within and about the park area should be uniform, obvious and welcoming in communities and in the neighborhoods of landlocked as well as water's edge communities.

Serious consideration should be given to providing a series of incentives to introduce the islands to residents of the region. For example, granting discounts to the region's community groups, and school and youth visitors on fares and tours to the islands. The issuance of seasonal or shorter-term individual and family (or group) park transportation passes could encourage revisits to the park area and engender a degree of park loyalty among our region's residents.

Selected gateways should allow for parking and put-in and take-out of trailer drawn and car top boats such as fishing boats as well as non-powered craft like kayaks and canoes.

At least one of these special gateways should be within Boston's inner harbor where sea walls often prevent paddle craft from resting or coming ashore. If it is not possible to have the launch ramp, float type dock and parking physically contiguous with the actual node of a designated gateway, minimally, they should be identified as an integral part of the park area and gateway complex and encourage the public to use the Park.

Accessibility to the islands would be enhanced by the siting of moorings in appropriate places and appropriate numbers. The continued availability of "community dinghies" would also encourage visitors to selected islands, making it possible to get onto these islands easily from a boat.

The General Management Plan would be significantly strengthened by enlarging its vision to include a clear commitment to sustainable development and energy alternatives as an important and legitimate way of highlighting and promoting innovative ways of thinking about how urban ecosystems can be managed into the future.

This may mean that some historic buildings are restored and converted, not into museums or simple historical interest points, but, into educational commercial, recreational or other activity venues.

- A new Harbor Management section (GMP p. 96) promotes small-boat launches to provide access to the islands for visitors.
- A fuller policy statement on water-based recreation has been added to the general management plan (GMP p. 97).
- The policy "Sustainability and Environmental Leadership" has been enlarged in the general management plan (GMP p.89).


We would prefer to see structures like Ft. Andrews rehabilitated, rather than torn down. That rehabilitation should be compatible with dynamic human uses, like education or conference centers, or youth hostels.

Wherever possible, infrastructure upgrades should include innovative, alternative and renewable technologies, energy (e.g. solar, wind, ocean, fuel cell, etc.), potable water (desalinization, etc.) and waste water treatment technologies.

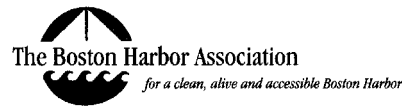
A commitment to and the incorporation of such newer, more responsible and publicly visible technologies, especially on an island and in a park setting, will be invaluable in creating a better sense of stewardship of the harbor, in particular, and, by extension, the earth's resources in general.

This is our chance to make this park work. We recognize that the inevitable tension that always exists between preservationists and recreationists is one of the challenges of the planning process, and we understand the arguments of both groups. However, our goal must now be to pull together. The time has come to give the Partnership, the Island Alliance and the Park Service the tools they need to move forward. I think everyone at the table recognizes that this is a once in a lifetime opportunity. It would be a shame to miss it because we couldn't forge a consensus around a strong and sensible compromise like Alternative C.

Thank you for your consideration.

Sincerely,  
  
Patricia A. Foley  
Executive Director  
Save the Harbor/Save the Bay

- Potential rehabilitation of Fort Andrews is described more fully in a new appendix, Economic Sustainability Strategy, 2001-2011 (GMP p.139).



1 August 2000

Mr. George Price, Project Manager  
Boston Harbor Islands National Park Area  
408 Atlantic Avenue, Suite 228  
Boston, MA 02110

Dear Mr. Price:

The Boston Harbor Association (TBHA) is a non-profit, public interest organization founded in 1973 to promote a clean, alive, and accessible Boston Harbor. Our interest in the Boston Harbor Islands goes back more than two and a half decades.

TBHA's first newsletter in November, 1974 devoted two of its four pages to the Harbor Islands, including an article entitled "MDC Prepares Harbor Island for Public Use." In 1975, a major TBHA priority was the "Restoration of the Harbor islands, their landings, buildings, horticulture and safety, and instituting a public ferry service with sufficient subsidization to assure easy and inexpensive access by the greater Boston public to the Harbor islands." In 1977, we organized a boatful of visitors for the very first picnic supper on Peddocks Island. Over a 25 year period we have pushed for funding to provide access to the Harbor Islands.

The Boston Harbor Association is very pleased to be a member of the Boston Harbor Islands Advisory Council. This past year, we participated in discussions which lead to the preparation of the Draft General Management Plan/ Draft Environmental Impact Statement.

TBHA was one of those who called for an alternative plan which incorporated elements from the original two options, "Alternative A : Nature and History Discovery" and "Alternative B: Diversified Recreation." We support the preferred alternative, "Alternative C", which attempts to blend the strongest elements in Alternatives "A" and "B". Alternative C recognizes the need to protect the most important natural and cultural

The Boston Harbor Association



resources while promoting the islands as a major recreational destination. We salute you and your colleagues, particularly Barbara Mackey and Sarah Peskin, in developing this excellent document which incorporates many of the suggestions made by Partnership and Advisory Council members at public meetings.

As you finalize the Plan to provide additional public usage of the islands, we ask that you consider the following:

**Protection of Natural Resources:** The Boston Harbor Islands are a unique resource, with many special natural features. Efforts to minimize adverse impacts to these natural as well as cultural resources should be strongly encouraged. Those activities which celebrate the natural resources of the islands should be emphasized, such as fishing, hiking, kayaking, sailing, and camping.

We support Alternative C's emphasis on visitor services and park facilities concentrated on five "hub" islands (Deer, George's, Long, Peddock's, and Spectacle). Relative to visitor usage, Alternative C, as described on page 62, will allow "Boardwalks (would) be built through salt marshes". Because of the fragile nature of the environment on many of the islands, only small boardwalks through limited portions of salt marshes should be permitted.

We further support the Draft Plan's sensitivity to the environment during special events. Special events may be authorized by the Partnership only when "there is a meaningful association between the park and the event, and the events do not damage resources" (page 41).

**Water Transportation:** Since 1975, The Boston Harbor Association has supported "instituting a public ferry service with sufficient subsidization to assure easy and inexpensive access by the greater Boston public to the Harbor islands." A frequently-operated, inexpensive water transportation system is key to ensuring all people access to the Harbor Islands.

Every attempt should be made to provide universal access at mainland gateways (waterfront locations with docking facilities), on water transit, and, at a minimum, at the "hub" islands.

In the preliminary environmental review for several large South Boston waterfront developments this past month, the Environmental Affairs

- The final general management plan strengthens the policy statement on visitor access, use, and enjoyment in relation to natural resources by reference to resource protection as the paramount responsibility (GMP p.73).

Secretary is requiring participation of developers in a September, 2000 Transportation Summit to ensure that sufficient capacity for future development exists. We hope that your offices will request that a portion of the meeting be devoted to water transit access to the Harbor Islands, including possible subsidy of such service by the private sector to serve as a Chapter 91 offset for the substitution of height or additional development in the water dependent use zone. Transit subsidies to the islands should not be in lieu of requirements to subsidize land-based mass transit.

Mainland Gateways: Fourteen locations are proposed as possible landside gateways to the islands. We are pleased to see that communities outside of Boston, such as Hull, Quincy, and Winthrop, are included. We support the Plan's proposal to include the John F. Kennedy Library and/ or UMASS Boston locations as a gateway to the islands for the Dorchester and neighboring communities, particularly since these locations are accessible by mass transit and parking is available nearby.

We suggest that the City of Chelsea be added to the list of potential gateways. This summer, The Boston Harbor Association, in conjunction with the City of Chelsea's Planning and Development Department and Eastern Salt Company, sponsored the first island trips ever to depart from Chelsea Creek. For most of these youths in Chelsea's Summer Boys and Girls Club program, it was their first boat trip and visit to the islands, and all gave rave reviews to the islands. Having a gateway in Chelsea will help connect residents to the waterfront, the Creek and the Harbor, and the islands.

Funding: The Draft Plan indicates that implementation of Alternative "C" on the islands could cost upwards of \$79 million, with gateway development another \$4 million to \$20 million.

It is not clear how funding will be secured to implement this plan, and we ask that the final version of the Plan be more specific on the funding mechanism.

In conclusion, this draft plan is an excellent document to help guide public use of the Harbor Islands. We look forward to working with the National Park Service, the Partnership, and the Advisory Council in making this plan a reality.

- Potential gateways are defined as departure points to the islands, whereas access to the harbor is available at many sites. In the plan, the criteria for gateways have been elaborated to give more specific guidance to municipalities and others who may propose a site for an officially recognized gateway (GMP p. 75). Groups can assure representation of their interests by participating in the public processes for gateway designations.
- The general management plan contains a new section on park financing (GMP p. 85), which addresses this point. The plan also states the intention that major infrastructure expenses will be paid from public funds, but that funding strategies and specifics of funding are the purview of implementation plans such as the five-year strategic plan. Because public agencies generally are prohibited from committing funds in advance of appropriations, it is not possible to determine proportional contributions from federal, state, and local agencies in a long-range plan such as a general management plan.

Thank you for your consideration of the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'V Li', with a stylized flourish underneath.

Vivien Li  
Executive Director

VL: pr